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May 14, 2014

By ECF  
Honorable Raymond J. Dearie  
United States District Judge  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, N.Y. 11201

Re: United States v. Bebars Baslan et. al.  
Criminal Docket 13 CR 220 (RJD)

Dear Judge Dearie,

On behalf of my client Bebars Baslan, we respectfully request a one week extension of time in which to file a reply to the government's opposition motion. Ms. Marosi and myself have been on trial before Judge Ross, which has only concluded today with the forfeiture phase of the proceedings.

The government filed its response in opposition late Monday evening, but we have only been able to conduct a cursory review it as of late yesterday evening, and the document with exhibits is approximately 150 pages long.

In order to craft an appropriate and thorough reply, we will need additional time to meet with Mr. Baslan at the MDC to review the government's opposition motion, before beginning any drafting. A one week extension of the original filing date of May 19, 2014 would bring the new filing date to May 26, 2014, and would allow us to accomplish all of this work without unduly straining the Court's schedule.

I thank Your Honor for Your courtesy,

/s/

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Ephraim Savitt

cc: All counsel (by ECF)